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November 17, 2023

Via ECF

Hon. Charles R. Breyer
United States District Judge
Phillip Burton Federal Building
450 Golden Gate Avenue
San Francisco, CA 94102

Re: *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*
Case No. 3:23-md-03084-CRB

Dear Judge Breyer:

I respectfully submit this letter in support of my application to serve on the Plaintiffs' Steering Committee in the above-captioned MDL. I am confident I meet the criteria set forth in the Court's Pretrial Order No. 3 and would effectively contribute to the leadership team for this important litigation. Attached to this letter please find Exhibit A, which sets forth the group of other lawyers who have been collaborating since this MDL was formed to address the various procedural and substantive issues that a complex matter of this type generates. This talented, committed, and diverse group has already demonstrated, in a very short time, its ability to work efficiently and effectively to move this litigation forward and serve the best interests of all claimants.

(1) Professional experience in this type of litigation, including MDL experience as lead or liaison counsel and/or service on any plaintiffs' committees.

As my resume (Ex. B) details, I have extensive experience litigating products liability cases, including in the MDL and complex litigation context. I have served as lead trial counsel in multiple products cases and have a long history of litigating the complicated legal issues these cases entail. I also have substantial experience leading large litigation teams, encompassing lawyers from different firms with different specialties and roles. As the Court will see, I developed most of this experience representing defendants, not plaintiffs. Nonetheless, I believe my litigation expertise positions me well to help lead this litigation for plaintiffs.

By way of background, I graduated from Stanford Law School in 2001 and served as a law clerk for both Judge Merrick Garland and Justice Stephen Breyer. I practiced for ten years at Baker Botts and during that time represented clients in multiple trials. As a first-year partner, I had my first stand-up trial experience in a securities fraud case tried before the now-retired Judge Shira Scheindlin, of the Southern District of New York. In 2013, I joined Paul, Weiss as a partner and began to focus my practice on products liability litigation. I represented defendants in MDLs and coordinated state court proceedings involving Hormone Replacement Therapy (“HRT”), Lipitor, and Zolof. Together with Beth Wilkinson, I tried (and won) the first two trials in the nation involving allegations of a link between Zolof and birth defects, both in state court. I also tried the final case in the HRT litigation, which settled before verdict.

In 2016, Ms. Wilkinson and I left Paul, Weiss, to found Wilkinson Walsh, a defense-side litigation boutique dedicated to trying high-stakes cases for corporate defendants. At Wilkinson Walsh, I continued my products liability practice and began serving in a first-chair role. I tried the final state-court bellwether in the Xarelto litigation and served as national trial counsel in the Essure litigation, which settled on the eve of the first trial (and was to take place before Judge Winifred Smith in Alameda County Superior Court). In addition to personal injury cases, I led several class action matters and tried a consumer fraud class action involving One A Day Multivitamins before Judge William Orrick, of the Northern District of California.

In early 2021, I launched Walsh Law, to pursue a new goal of representing individuals and families as plaintiffs. Since then, I have been privileged to litigate in several complex product and class MDLs. In 2021, I was lead trial counsel in a bellwether case in the 3M Product Liability MDL, 3:19-md-2885. In the spring and summer of 2022, I worked with other leadership firms to organize the J&J Sunscreen MDL, 0:21-md-3015, in which I was appointed Plaintiffs’ Class Liaison Counsel by Judge Raag Singhal of the Southern District of Florida.

In 2023, I began representing children and adolescents struggling with mental health disorders related to their use of social media platforms. I collaborated with attorneys for other similarly situated plaintiffs to seek the formation of an MDL concerning these claims. That MDL, *In re Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, 4:22-md-3047, is now pending before Judge Gonzalez Rogers of the Northern District of California, and I am proud to serve on the MDL’s Plaintiffs’ Steering Committee Leadership.

(2) Names and contact information of judges before whom the applicant has appeared in the matters discussed above.

My resume provides the names of the judges in the matters discussed above as well as their contact information.

(3) Willingness and ability immediately to commit to time-consuming litigation.

I am deeply committed to this important litigation. I am willing and able to commit the time and attention necessary to help drive it forward, as are the other members of my firm. In addition to working on behalf of our own clients, including the plaintiff in *H.B. v. Uber Technologies, Inc.*, 3:23-cv-05949, I, along with my team, have already contributed to drafting initial filings and developing potential expert witnesses.

(4) Willingness and ability to work cooperatively with other plaintiffs' counsel and defense counsel.

Collegiality and professionalism are and always have been fundamental to my practice. That many of my strongest working relationships on the plaintiff side are with lawyers who were once my opponents confirms my ability to work cooperatively with those on the other side. The work I have already done with my co-counsel in this litigation demonstrates our ability to collaborate effectively for the benefit of our clients.

(5) Access to resources to prosecute the litigation in a timely manner.

Walsh Law is a small, but highly effective litigation firm. Our skilled and experienced team includes my partner, Kim Channick (who was also with me at Paul, Weiss and Wilkinson Walsh), as well as three rising start litigators, including William Smith, who joined the firm after several years working on trial teams at Kirkland & Ellis. Both Kim and William, who themselves have extensive trial and expert work-up experience, will join me in focusing their efforts on this MDL. In addition to our legal team, the firm also has the financial resources necessary to commit to the litigation.

(6) Other considerations that qualify counsel for a leadership position.

I am proud of my work as a trial lawyer and of the recognition that work has garnered. In 2018, I received recognition from the *National Law Journal* for a decisive win in the final state-court bellwether trial in the Xarelto litigation. In 2019, I was named a Trial MVP of the Year by *Law360* for a victory in the One A Day Multivitamin class action trial. In 2020, the *New York Law Journal* elevated to its Verdict Hall of Fame the billion-dollar jury award I helped secure in the securities fraud case I tried before Judge Scheindlin. Most recently, I was inducted as a Fellow in the American College of Trial Lawyers, which limits its membership to "experienced trial lawyers who have mastered the art of advocacy and whose professional careers have been marked by the highest standards of ethical conduct, professionalism, civility and collegiality."

I thank the Court for its consideration and stand ready to provide any additional information that would be helpful to this important appointment process.

Yours truly,



Alexandra Walsh
Founding Partner, Walsh Law PLLC